IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GUARDIAN INDUSTRIES CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 05-27-SLR
	)	
DELL, INC. et al.,	)	
	)	
Defendants.	)	

PROVIEW INTERNATIONAL HOLDINGS, LTD.'S
MOTION TO STAY PENDING RESOLUTION OF THE CASES
AGAINST LCD MODULE MANUFACTURERS

Defendant Proview International Holdings, Ltd. ("Proview Holdings") respectfully moves this Court to enter an Order staying the above-captioned action against Proview Holdings pending the final resolution of Plaintiff Guardian Industries Corporation's ("Guardian") claims against the liquid crystal display ("LCD") product manufacturers in this action.

Guardian has brought suit before against other defendants in a separate case (hereinafter referred to as "Guardian I"). However, the facts in this case are significantly different than the facts in Guardian I. First, in this case, the defendants include both the LCD manufactures, as well as a significant number of customers. In Guardian I, Guardian focused its claims primarily against the LCD manufacturers. Second, in this case, there are substantially more customer defendants than were present in Guardian I. Allowing discovery to proceed with respect to these customer defendants, most of whom have little if any additional knowledge about the accused products, would needlessly complicate discovery. Third, and perhaps most importantly, none of the defendants in Guardian I moved to stay the case prior to the commencement of discovery.

The LCD manufacturers are the real parties in interest in this case. The LCD manufacturers, not a company outside the distribution chain for these products like Proview Holdings, are the parties with the information and documentation to defend against Guardian's claim. Indeed, Proview Holdings does not manufacture, design, or sell LCDs or LCD related products. In fact, Proview Holdings is merely a holding company and is not involved in any sales transactions. Thus, Proview Holdings does not possess any information regarding the LCD products accused of infringing the asserted patents in this case.

In an attempt to simplify this case, Proview Holdings now moves to stay the action, thereby allowing the LCD manufacturers to logically take the lead. Further, staying this case against Proview Holdings pending resolution of Guardian's claims against the LCD manufacturers would further the interests of justice and litigation efficiency and economy by significantly streamlining and simplifying the issues, discovery, and trial in this complex, multi-party case.

Proview Holdings submits the Declaration of Elina Hui (Exhibit A hereto) in support of this Motion. In addition, Proview Holdings joins in and incorporates by reference the points and authorities set forth in the briefs in support of the motions to stay filed by Dell, Inc. on June 3, 2005, and Gateway, Inc. on June 8, 2005, as grounds for this Motion. A proposed Order granting Proview Holdings' motion is attached hereto.

Rule 7.1.1 Certification. Counsel for Proview Holdings have consulted with counsel for Plaintiff Guardian Industries Corporation pursuant to Delaware Local Rule 7.1.1 and have been advised that Plaintiff will not consent to the relief sought by this Motion.

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Attorneys for Defendants
Proview International Holdings, Ltd.

Dated: July 12, 2005

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EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GUARDIAN INDUSTRIES CORP.,	)	
Plaintiff,	)	
v.	)	
DELL, INC.; GATEWAY, INC.; HEWLETT-PACKARD COMPANY; ACER INC.; ACER AMERICA CORPORATION; AOC INTERNATIONAL; ENVISION PERIPHERALS, INC.; TPV TECHNOLOGY, LTD.; TPV INTERNATIONAL (USA), INC.; AU OPTRONICS CORPORATION; AU OPTRONICS CORPORATION AMERICA a/k/a AU OPTRONICS AMERICA, INC.; BENQ CORPORATION; BENQ AMERICA CORPORATION; CHUNGHWA PICTURE TUBES, LTD. a/k/a CHUNGHWA PICTURE TUBES COMPANY; TATUNG COMPANY; TATUNG COMPANY OF AMERICA, INC.; BOE HYDIS TECHNOLOGY COMPANY, LTD.; BOE HYDIS AMERICA INC.; CHI MEI OPTOELECTRONICS; COMPAL ELECTRONICS, INC.; HANNSTAR DISPLAY CORPORATION; JEAN CO., LTD.; LITE-ON TECHNOLOGY CORPORATION: LITE-ON, INC. a/k/a LITEON TRADING USA, INC.; MAG TECHNOLOGY COMPANY, LTD.; MAG TECHNOLOGY USA, INC.; PROVIEW INTERNATIONAL HOLDINGS, LTD.; PROVIEW TECHNOLOGY, INC.; PROVIEW ELECTRONICS COMPANY, LTD.; and QUANTA DISPLAY, INC.	)	C. A. No. 05-27-SLR **Jury Trial Demanded**
Defendants.	)	

DECLARATION OF PROVIEW INTERNATIONAL HOLDINGS, LTD.

I, Elina Hui, hereby declare as follows:

1. I submit this declaration in support of Proview Holdings' motion to stay this case against Proview Holdings. The facts stated herein are based on my personal knowledge and my review of Proview Holdings' books, business records and other business information, as well as my conversations with other Proview Holdings employees. If called to testify regarding the same, I could do so competently.

2. I understand that Guardian Industries Corporation ("Guardian") has filed a lawsuit against Proview Holdings alleging infringement of U.S. Patent No. 5,570,214, entitled "Normally White Twisted Nematic LCD with Retardation Films on Opposite Sides of Liquid Crystal Materials for Improved Viewing Zone," U.S. Patent No. 5,694,187, entitled "LCD Including a Negative Biaxial Retarded on Each Side of The Liquid Crystal Layer, " U.S. Patent No. 6,226,065, entitled "Liquid Crystal Display Having High Contrast Viewing Zone Centered in Positive or Negative Vertical Region," and U.S. Patent No. 6,229,588, entitled "Normally White LCD Including First and Second Biaxial Retarders," (referred to collectively herein as "the patents-in-suit"). I understand that each of the patents-in-suit is directed to a certain type of LCD.

3. Proview Holdings is a holding company. Proview Holdings is not involved in any sales transactions. Proview Holdings does not manufacture, design, or sell LCDs or LCD related products and Proview Holdings does not possess any information regarding the accused products.

I declare that the foregoing is true and accurate to the best of my knowledge under penalty of perjury of the laws of the United States.

Dated: ~~June~~ July 9th, 2005

Elina Hui

[Elina Hui]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I, Richard L. Horwitz, hereby certify that on July 12, 2005, the attached document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

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I hereby certify that on July 12, 2005, I have Federal Expressed the documents to the following non-registered participants:

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